

HRR**WWE****Wright Water Engineers, Inc.****DENVER OFFICE**

2490 West 26th Ave., Suite 100 A  
Denver, Colorado 80211  
Tel. (303) 480-1700  
Fax (303) 480-1020

**GLENWOOD SPRINGS OFFICE**

818 Colorado Avenue  
P.O. Box 219  
Glenwood Springs, Colorado 81602  
Tel. (303) 945-7755  
Denver Direct Line: 893-1608  
Fax (303) 945-9210

**FAX TRANSMISSION**

To: Marla Broussard From: Frank J. Blaha  
Fax Number: 966-8538 Date: 2/1/93  
Total Pages Including Cover: 4 Job Number: 991-799.000

Comments: We should talk briefly about  
some of these issues. For instance -  
should we only do major processing  
buildings such as "resumption" buildings  
plus other major ones. also,  
what if changes in IHSS/PAC  
boundaries due to new & better  
information?

Please call Beth at (303) 480-1700 if you do not receive all the pages.

CC: Nick Demos

ADMIN RECORD

SW-A-005582

THOUGHTS ON HRR QUARTERLY UPDATES  
January 31, 1993

The following is a brief synopsis of the major points discussed at two meetings with EPA and CDH regarding the Historical Release Report (HRR). These meetings were held on April 16 and May 4, 1992. EG&G, DOE, CDH and EPA were represented at these meetings, as well as subcontractors to EG&G. This letter is based on my written notes from the meeting as well as my recollection of the various discussions and resolutions that were reached.

Indoor Unplanned Events

The agencies (primarily Martin Hestmark) had a concern at the April 16, 1992 meeting that indoor unplanned events (IUE) (such as radiation contamination incidents and small spills) were not adequately tracked in the HRR. They would have liked to have seen an itemized list of each IUE. It was explained to them that this would be very hard to do with any degree of confidence due to the large number of IUE events and the spotty documentation associated with them. This explanation seemed to satisfy them, but they requested additional proof to be assembled for our next meeting. This issue was re-visited in the May 4, 1992 meeting. We had prepared by that time a quick description of how all radiation contamination incidents inside buildings have been recorded and stored. We explained that due to the lack of formality of recording procedures for these events in the 1950s and 1960s no matter how much work we did we could not ensure that all such incidents had been recorded and thereby presented in the HRR. At this point Martin admitted that his major concern with these events was related to decontamination and decommissioning (D&D) of the buildings, and being able, with some confidence, to identify contaminants and locations under and near buildings that could have been impacted by past events. After considerable discussion (with Martin Hestmark and Harlen Ainscough primarily representing the two agencies) it was decided that the agencies could forego a complete listing of IUEs, and revision of the minimum sized inside spill of concern (discussed below), if complete process histories of any building that had had a process located within it were prepared. The intent of this process history is to be as specific as possible regarding the location and types of material used in any process. This information will guide the agencies in the selection of sampling analytes as well as sample location in the course of D&D work at the RFP.

The agencies also had a concern in the April 16, 1992 meeting that the 10 pound threshold value for an indoor liquid spill (that we used) was too large a quantity. They stated that they could be very interested, especially in the course of decontamination and decommissioning buildings, in spills of smaller quantities than this. It was explained to them that since the inside of a building does not constitute the environment, and since in some ways the building itself provides secondary containment, a ten gallon spill

**HRR Agency Meetings**

Page 2

January 31, 1993Wright Water Engineers, Inc.

inside a building really represents a small quantity of material that could impact the environment. The agencies also requested explanation of how this 10 pound number had been arrived at, and it was explained to them that it was arbitrarily set based on a brief review of indoor spills. A large number of spills smaller than 10 pounds had been recorded for some buildings, while other buildings had none - leading to an onerous amount of work to track these relatively small spills that would arguably be incomplete even after the expenditure of large amounts of time and money. This explanation seemed to satisfy the agencies that a 10 pound threshold for indoor spills was acceptable, but they reserved the right to think about this and re-visit the issue at the next meeting. At the May 4, 1992 meeting the agencies stated that although they were not entirely happy with the number, a 10 pound threshold quantity seemed to constitute a practical value, especially if process histories were done for buildings (see above).

**Potential Incidents of Concern**

In the April 16, 1992 meeting the agencies wanted Potential Incidents of Concern (PICs) sites (which essentially constituted a Potential Area of Concern (PAC) which we felt we could not accurately map) mapped to the best of our ability. So, if a car's gas tank overflowed and all we knew was the parking lot, they wanted the parking lot identified on a map. This issue was re-visited in the May 4, 1992 meeting. We again expressed our concern that the PIC sites, if identified as an entire parking lot would become an IHSS that encompassed the entire parking lot, even if the spill was a small quantity located in only a very small discrete areas of that parking lot. The agencies agreed that this was a potential problem. After considerable discussion it was agreed that the agencies would review the final HRR, and if any particular PIC seemed important to them they would identify it as a PIC for which they wanted an accurate location. We stated that an accurate location could probably be provided for each PIC of real interest, defaulting to the entire parking lot if accurate information could not be found. We felt that this approach would avoid a large time commitment to map small PIC events which mostly would not be of concern. It was also stated that should EG&G determine an accurate PIC location in the course of other work, that this PIC location would be presented in the next HRR update, making that PIC a PAC.

**Air Releases**

At the April 16, 1992 meeting the agencies first stated that they wanted all air releases addressed - so presentation of all data for all air monitoring at each building would be required. They also stated, however, that they were more concerned with identifiable

**HRR Agency Meetings**

Page 3

January 31, 1993Wright Water Engineers, Inc.

"events" such as fires or explosions, etc., that impacted air emissions. This issue was not resolved in the April meeting, but was concluded in the May meeting at which time it was decided that only major/identifiable air releases needed to be written up in the HRR updates.

**IHSS 119.1 and 119.2**

In the April 16, 1992 meeting the agencies requested clarification regarding what we thought the true events surrounding the creation of IHSS 119.1 and 119.2 were. We stated that, contrary to previous information presented on the site, we could not confirm the storage and disposal of bulk (drummed) solvents or liquids at the site. We rather had learned that a site immediately east of IHSS 119.2 had been used for the destruction/disposal of small quantities of solvents. To the best of our ability to determine, the events at 119.1 and 119.2 consisted of the storage of scrap metals and materials while they accumulated for offsite sale. These materials would have been excess to the operations at the Rocky Flats Plant (RFP) but had resale value associated with them, and were being stored by the Property Utilization and Disposal (PU&D) group. Some of the metals stored consisted of chips and cuttings that would have had oils associated with them. The oils would also have likely been contaminated with solvents, and these oils and solvents would have drained off the metal chips and cuttings while the metal was stored at the site. These metals were stored both in drums and other containers, as well as directly on the ground. The agencies seemed satisfied with our explanation, but requested that we modify the name presented for the IHSS to reflect both the name the site had previously had (solvent storage site) as well as the storage of scrap metals.

**Polychlorinated Biphenyl (PCB) Sites**

This issue only came up during the May meeting. The agencies wanted PCB sites identified in the HRR, but complete write-ups similar to the other HRR write-ups were not required so long as the PCB-related documents were attached to the HRR as an Appendix or Attachment. We were left to our discretion whether or not to identify or include PCB issues in the narratives for any particular site. They were cognizant that the PCB issue was evolving and that new information was being generated in an ongoing basis. So long as we identified PCBs as an issue, and provided cross-references to the PCB Appendix/Attachment, they felt the terms of the IAG would be satisfied.

**HRR Agency Meetings**

Page 4

January 31, 1993Wright Water Engineers, Inc.**FBI/Rockwell International Database**

The issue of the FBI raid and grand jury came up at the May 4, 1992 meeting. The agencies were aware that Rockwell International had created a large database of documents that were environmentally-related as a part of the activities related to the FBI raid of the RFP, the grand jury hearings, and the Rockwell defense. The agencies requested that the FBI database should be searched for information and documents relevant to the HRR, should the database become available due to the settling of the FBI raid and grand jury hearings. At the time the grand jury case was not settled, and this request from the agencies was noted, but not necessarily committed to by DOE since the details would have to be worked out after the grand jury case was settled. There was simply no way to predict what issues might arise regarding access to this database.

**Quarterly Updates**

The issue of the format for required quarterly updates to the HRR was discussed. The agencies stated that the reports made by the Occurrence Notification Center (ONC) and under the RCRA Contingency Plan were not necessarily equivalent to a quarterly update for the HRR. The format and information content required for HRR updates were different than the ONC and RCRA Contingency Plan Implementation reports - the HRR updates should be made with a level of detail and in a format similar to the existing HRR narratives.

**Schedule**

The first update to the HRR was scheduled at the meeting for October 1, 1992, or the first work day following October 1st. Updates would come in quarterly thereafter. Issues of air releases and building histories were to be addressed in the first four quarterly updates to the HRR, with no more specific schedule identified (all such information could have been included in one update, or split equally amongst the four updates, etc.). It was stated that updates to the HRR would be made one quarter in arrears (so the October update would only include spills etc. up to the beginning of July).

*Frank J. Blaha*  
*11/31/93*